

ORIGINAL
BELLSOUTH

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kathleen.levitz@bellsouth.com

January 7, 2000

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Kathleen B. Levitz
Vice President-Federal Regulatory

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Fax 202 463-4198

RECEIVED
JAN - 7 2000
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

EX PARTE OR LATE FILED

Re: Written Ex Parte in CC Docket No. 98-121
and CC Docket No. 99-295

Dear Ms. Salas:

This is to inform you that BellSouth Corporation has made a written ex parte to Andrea Kearney, a senior attorney in the Common Carrier Bureau's Policy and Program Planning Division, with copies of that ex parte going also to William Agee and Jake Jennings. That ex parte consists of a copies of Exceptions that KPMG filed with the Georgia Public Service Commission on December 3, 1999, and January 4, 2000, in connection with its execution of the Georgia Third-Party Testing Plan for BellSouth's Operation Support Systems, or OSS. Included in each of those filings is BellSouth's response to each of the exceptions KPMG raised in that filing.

Pursuant to Section 1.1206(b)(1) of the Commission's rules, we are filing two copies of this notice and that written ex parte presentation in the docket identified above. Please associate this notification with the record in that proceeding.

Sincerely,

Kathleen B. Levitz

Attachment

cc: Andrea Kearney (w/o attachment)
William Agee (w/o attachment)
Jake Jennings (w/o attachment)

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List A B C D E

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January 7, 2000

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Written Ex Parte in CC Docket No. 98-121
and CC Docket No. 99-295

Dear Ms. Salas:

This is to inform you that BellSouth Corporation has made a written ex parte to Andrea Kearney, a senior attorney in the Common Carrier Bureau's Policy and Program Planning Division, with copies of that ex parte going also to William Agee and Jake Jennings. That ex parte consists of a copies of Exceptions that KPMG filed with the Georgia Public Service Commission on December 3, 1999, and January 4, 2000, in connection with its execution of the Georgia Third-Party Testing Plan for BellSouth's Operation Support Systems, or OSS. Included in each of those filings is BellSouth's response to each of the exceptions KPMG raised in that filing.

Pursuant to Section 1.1206(b)(1) of the Commission's rules, we are filing two copies of this notice and that written ex parte presentation in the docket identified above. Please associate this notification with the record in that proceeding.

Sincerely,

Kathleen B. Levitz

Attachment

cc: Andrea Kearney (w/o attachment)
William Agee (w/o attachment)
Jake Jennings (w/o attachment)

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Vice President-Federal Regulatory

202 463-4113
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January 7, 2000

WRITTEN EX PARTE

Ms. Andrea Kearney
Policy and Program Planning Division
Common Carrier Bureau
Room 5-C330
Federal Communications Commission
The Portals
445 12th St. S.W.
Washington, D.C. 20554

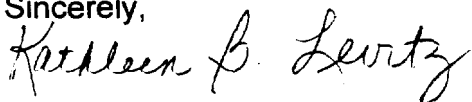
Re: CC Docket No. 98-121 and CC Docket No. 99-295

Dear Ms Kearney:

Attached are copies of KPMG Exceptions 1 through 3 arising during KPMG's execution of the Georgia Third-Party Testing Plan for BellSouth's Operation Support Systems, or OSS. Exceptions 1 and 2, as well as BellSouth's response to each, were filed with the Georgia Public Service Commission on December 3, 1999. Exception 3 and BellSouth's response to that exception were filed with that Commission on January 4, 2000. I am sending these filings to you in response to your request that BellSouth share with you any status reports prepared by KPMG as part of the third party testing program currently underway in Georgia. If you have any questions after reviewing the report, please call me at 202.463.4113.

Pursuant to Section 1.1206(b)(1) of the Commission's rules, I am filing two copies of this written ex parte presentation with the Secretary of the Commission and requesting that it be associated with the record in the docket identified above.

Sincerely,



Kathleen B. Levitz
Attachment

cc: William Agee
Jake Jennings



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Telephone 404 222 3000
Fax 404 222 3050

December 3, 1999

Ms. Helen O'Leary
Executive Secretary
Georgia Public Service Commission
47 Trinity Avenue SW, Room 520
Atlanta, GA 30334

RECEIVED

DEC 03 1999

**EXECUTIVE SECRETARY
G.P.S.C.**

**RE: Investigation into Development of Electronic Interfaces for BellSouth's
Operational Support Systems; Docket No. 8354-U**

Dear Ms. O'Leary:

Enclosed please find an original and twenty-six (26) copies, as well as an electronic copy, of KPMG LLP's Exceptions 1 and 2 along with BellSouth's responses to Exceptions 1 and 2 for filing in the above referenced matter.

I would appreciate your filing same and returning a copy stamped "filed" in the enclosed stamped, self-addressed envelope.

Thank you for your assistance in this regard.

Very truly yours,

David Frey
Manager

Enclosures

cc: Parties of Record



KPMG LLP is a member firm of the KPMG network, which is a Swiss entity. KPMG LLP is a member firm of the KPMG network, which is a Swiss entity.

**BellSouth Georgia OSS Testing Evaluation**

Date: November 12, 1999

EXCEPTION REPORT

An exception has been identified as a result of test development activities associated with the TAG Pre-Ordering Functional Test (PRE-1) and the TAG Pre-Ordering Documentation Evaluation (PRE-3).

Exception:

BellSouth does not provide comprehensive and usable business rule documentation for submitting electronic pre-order transactions via the TAG interface.

Business rule documentation provides a Competitive Local Exchange Carrier (CLEC) with clear and complete instructions on populating field or data element values necessary for each transaction type. Business rule documentation should contain the following components:

- Data element names and abbreviations
- Data element arrangement
- Data element definitions
- Data element usage
Usage defines the circumstances under which the data element is required, conditional, optional, prohibited, or not applicable.
- Number of occurrences
Occurrences define the number of times a data element may be included in the query.
- Data characteristic
Data characteristics include the number of characters required or permitted in this field, and the type of character required or permitted (e.g., alpha or numeric).
- Specific rules for conditional usage requirements
- List of valid entries, where appropriate
- Examples of data inputs, where appropriate

BellSouth Georgia OSS Testing Evaluation

BellSouth Pre-Order Documentation

BellSouth currently refers CLECs to a variety of documents to obtain pre-order business rule information, including the following:

- *TAG API Reference Guide*
- *TAG Programmer's Job Aid*
- TAG training presentation materials

None of the documents listed above provides a comprehensive business rule guide for pre-order queries using the TAG interface. While certain business rule components are included in one or more of the TAG documents (e.g., *API Guide* provides data element arrangement), these references are incomplete and sometimes inconsistent across the documents. Information on data element definitions, data characteristics, number of occurrences and conditional usage requirements is absent from all TAG pre-order documentation. Information on data element usage, found only in the presentation materials obtained during TAG training, is incomplete. Usage rules for pre-order inquiries are only provided for a select number of fields. In addition to the absence of business rules for submitting pre-order inquiries, BellSouth TAG documentation does not provide adequate information on pre-order response files. This information is required for development of integrated pre-order/order processes where information returned from pre-order inquiries is programmatically input into order entry systems.

Some of the pre-order business rule information is only provided during TAG training classes and is not available on the BellSouth documentation Website. As a result, there are inadequate document management procedures surrounding the updating and distribution of these materials.

Impact

The absence of a comprehensive set of pre-order business rules affects CLECs through:

- Increased time required for the design and population of pre-order transactions
- Order entry errors resulting from incomplete or inconsistent business information
- Increased lead times required for construction of integrated pre-order and order entry systems. Inadequate documentation on the data elements being returned on a pre-order response make it difficult to develop and update programs to retrieve pre-order response information, filter into a CLEC customer database, and integrate into subsequent orders.



Date: November 16, 1999

EXCEPTION REPORT

BellSouth does not provide comprehensive and usable business rule documentation for submitting electronic pre-order transactions via the TAG interface.

A comprehensive document providing business rules for pre-order transactions is currently under development. It will contain a data dictionary providing definitions of all fields, usage rules, data characteristics, number of occurrences and valid entries, where applicable. This document will be available to all CLECs on the Interconnection website by the end of 1999.

**BellSouth Georgia OSS Testing Evaluation**

Date: November 12, 1999

EXCEPTION REPORT

An exception has been identified as a result of the ongoing Change Management Practices Review (CM-1).

Exception:

BellSouth's change management process does not include clearly defined and reasonable intervals for notifying customers about changes to electronic interfaces and supporting documentation.

Based on interview sessions and documentation reviews conducted as part of the CM-1 Test, KPMG has observed that BellSouth's processes for introducing changes to electronic interfaces, business rules, and technical specifications do not include fully defined and published change management processes and intervals for items that affect Competitive Local Exchange Carriers (CLECs). BellSouth's published change management process should define intervals for both BellSouth- and CLEC-initiated changes, including changes that stem from both system enhancements (features) and corrections of defects.

Key elements of a comprehensive change management process include:

- Multi-dimensional classification system for changes.
 - Type (source).
 - Severity
 - Event category (interface, documentation, procedures).
- Defined intervals for all classifications.
- Opportunity for CLEC testing of changes.

Under current methods and procedures, documentation reflecting new interface fields, field formats, and business rules or procedures can be introduced and made effective the day of release. In September and October 1999, multiple on-line CLEC customer guide updates were released. In each case listed below, the notification interval was inadequate to allow CLECs to assess the operational impact of the change and make corresponding adjustments.



EXCEPTION

BellSouth Georgia OSS Testing Evaluation

Document Title	Posting Date	Notification Date	Notification Interval
BellSouth Guide to Interconnection, Issue 8E	September 22, 1999	None	0 days
LEO Implementation Guide (Volume 1), Issue 7K	November 1, 1999 ¹	October 28, 1999	4 days ¹
LEO Implementation Guide (Volume 4), Issue 7F	October 28, 1999	None	0 days
Local Exchange Navigation System (LENS) User Guide, Issue 7B	September 9, 1999	None	0 days
Collocation Handbook, Issue 8	September 16, 1999	None	0 days
Local Number Portability Ordering Guide for CLECs, Issue 1B	October 27, 1999	None	0 days
Telecommunications Access Gateway (TAG), Release 2.2.0.5	October 30, 1999	October 28, 1999	2 days

Impact:

In the absence of a comprehensive change management process that includes defined intervals for change events, BellSouth's current practices could adversely affect CLEC business operations.

Examples of how CLEC operations could be affected include:

- Workforce management disruptions resulting from emergency allocation of CLEC personnel to address a required change(s) immediately.
- Order entry errors resulting from an inability to appropriately train CLEC order entry personnel in advance of a change. An increased frequency of errors results in higher order fallout rates that can lengthen the total interval for service installation.
- Reductions in customer satisfaction due to an inability to quickly process order types affected by a change event.

¹ In the case of LEO Implementation Guide, Volume 1, Issue 7K, although the Web site's stated posting date reflects October 27, 1999, the document was actually available there on November 1, 1999. A CLEC would, therefore, have realized an actual notification interval of four days.



Date: November 16, 1999

Exception:

BellSouth's change management process does not include clearly defined and reasonable intervals for notifying customers about changes to electronic interfaces and supporting documentation.

Key elements of a comprehensive change management process include:

Severity – Designations are applicable to defects only and are internal measurements used in BellSouth. The EICCP process was initially developed to provide a means for CLECs to request enhancements. It is not the vehicle for CLECs to identify corrections for defects. Their account team or Customer Support Manager would be the point of contact for software defects, which would be directed to the appropriate project manager to be tracked and prioritized internally.

Defined intervals for all classifications – Intervals for CLEC initiated changes via the EICCP process are negotiated with the CLECs prior to any development work beginning

Opportunity for CLEC testing of changes – BellSouth provides several opportunities for CLECs to test changes, depending on whether they have been deemed production ready or are in a testing phase. If the CLEC is in application or validity testing, when they have made the changes to their system, they can test with BellSouth to ensure changes made by BellSouth address any problems they have encountered. TAG users have the option of scheduling testing whenever they make changes to their code that are a result of BellSouth initiated changes. Additionally, as BellSouth migrates to newer platforms, each CLEC developing their own front-end, or making mapping changes is required to test with BellSouth prior to sending production transactions.

Documentation

- BellSouth Guide to Interconnection is not OSS impacting, unless the CLEC orders Feature Group D service via an Access Service Request. (The interfaces used would exclude TAG and EDI)
- LEO Implementation Guide (Volume 1) was an emergency update based on CLEC input regarding some discrepancies in the LEO IG and the TAG documentation.
- LEO Implementation Guide (Volume 4) was updated to gain a consistent look and feel of the Issue 7 specifications in preparation for the Issue 9 updates. There was one CLEC-impacted change which was to correct a statement in the documentation that had been in error for quite some time regarding whether an 850 or 860 should be sent when an 860 is rejected.
- Collocation Handbook is not OSS impacting
- Telecommunications Access Gateway was updated in conjunction with LEO IG Volume 1 to correct some discrepancies between the TAG documentation and the LEO IG.



- Collocation Handbook is not an OSS impacting document.

-

CERTIFICATE OF SERVICE

Docket No. 8354-U

This is to certify that I have this day served a copy of the within and foregoing, upon known parties of record, by depositing same in the United States Mail with adequate postage affixed thereto, properly addressed as follows:

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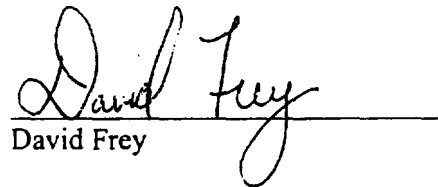
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Atlanta, GA 30339

Fred McCallum, Jr.
125 Perimeter Center West
Room 376
Atlanta, GA 30346

This 3rd day of December 1999.


David Frey

KPMG
303 Peachtree Street, N.E.
Suite 2000
Atlanta, Georgia 30308
(404) 222-3000



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Telephone 404 222 3000
Fax 404 222 3050

RECEIVED

JAN 04 2000

EXECUTIVE SECRETARY
G.P.S.C.

January 4, 2000

Ms. Helen O'Leary
Executive Secretary
Georgia Public Service Commission
47 Trinity Avenue SW, Room 520
Atlanta, GA 30334

**RE: Investigation into Development of Electronic Interfaces for BellSouth's
Operational Support Systems; Docket No. 8354-U**

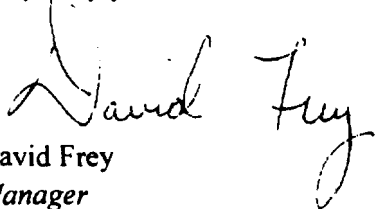
Dear Ms. O'Leary:

Enclosed please find an original and twenty-six (26) copies, as well as an electronic copy, of KPMG LLP's Exception 3 with BellSouth's response for filing in the above referenced matter.

I would appreciate your filing same and returning a copy stamped "filed" in the enclosed stamped, self-addressed envelope.

Thank you for your assistance in this regard.

Very truly yours,



David Frey
Manager

Enclosures

cc: Parties of Record



ATTENTION: KPMG LLP, 303 Peachtree Street, N.E., Suite 2000, Atlanta, GA 30308
Telephone: 404.222.3000, Fax: 404.222.3050, E-Mail: kpmg@kpmg.com



Date: December 15, 1999

EXCEPTION REPORT

An exception has been identified as a result of the Performance Measurement testing activities associated with the validation of service quality measurement (SQM) calculations.

Exception:

Competitive Local Exchange Carriers (CLECs) are not notified when BellSouth initiates changes to published historical performance measurement reports and/or the raw data files associated with these reports after this information has been removed from the Performance Measurement and Analysis Platform (PMAP) web site.

Each month BellSouth publishes specific performance measurement reports and the raw data used to create reports that are sent to individual CLECs, the Georgia Public Service Commission (PSC) and the Federal Communications Commission (FCC). These reports and raw data may be delivered in hard copy or via a secured Internet site, the Performance Measurement and Analysis Platform (PMAP).

The PMAP web site posts each month's CLEC-specific and CLEC-aggregate reports and CLEC-specific raw data on the 15th of the following month. Only the current month of reports and raw data are maintained on the PMAP web site.

KPMG observed that in cases where BellSouth initiates changes to the performance measurement reports and/or raw data after this information has been removed from the PMAP web site, CLECs are not notified, including CLECs affected by the reporting change.¹

During the initial posting period, a CLEC is informed of changes to reports and/or raw data if and only if that CLEC has previously downloaded the reports and/or raw data from the PMAP web site for that month. However, if BellSouth changes reports and/or raw data for a prior month, CLECs are not notified of these changes, irrespective of whether or not the reports and/or raw data for that month were downloaded by the CLEC.

KPMG noted the following specific examples of changes to data for a CLEC for the month of August 1999:

- **Business Function: Ordering**
SQM: Percent Rejected Service Requests

¹ BellSouth assured KPMG that the FCC is notified accordingly of all report and raw data changes, irrespective of the month in which these changes occurred.

BellSouth Georgia OSS Testing Evaluation

Percent Rejected Service Requests is the percent of total Local Service Requests (LSRs) received which are rejected due to error or omission. An LSR is considered valid when it is electronically submitted by the CLEC and passes Local Exchange Ordering (LEO) edit checks to ensure that the data received is correctly formatted and complete.²

- Business Function: Ordering
SQM: Reject Interval

Reject Interval is the average reject time from receipt of an LSR to the distribution of a reject. An LSR is considered valid when it is electronically submitted by the CLEC and passes LEO edit checks to ensure the data received is correctly formatted and complete.²

- Business Function: Provisioning
SQMs: Average Completion Interval and Order Completion Interval (OCI) Distribution.

The Average Completion Interval measure monitors the interval of time it takes BST to provide service for CLEC customers or its own customers. The Order Completion Interval Distribution measures the percentage of orders completed within certain time periods.²

- Business Function: Provisioning
SQM: Mean Held Order Interval

The Mean Held Order Interval measure, calculated at the close of each reporting interval, calculates the average time for which uncompleted orders have passed their currently committed due date.²

- Business Function: Provisioning
SQM: Coordinated Customer Conversion.

This category measure the average time it takes BST to disconnect an unbundled loop from the BST switch and cross connect it to a CLEC's equipment. This measurement applies to service orders with and without Interim Number Portability (INP), and where the CLEC has requested BST to provide a coordinated cutover.²

BellSouth attributed changes in the reported values in these instances either to errors in reporting or to changes in the raw data.

² BellSouth Service Quality Measurements, Georgia Performance Reports. Version 10/22/99



BellSouth Georgia OSS Testing Evaluation

Impact

Inaccurate service quality information: The FCC has made it a mandatory requirement for BellSouth to provide its business function (e.g., pre-ordering, ordering, provisioning, maintenance & repair, billing) performance measurement reports to the CLECs with which it does business. CLECs utilize the reports to assess the quality of service provided by BellSouth.

If CLECs are not informed of changes in the reports, they will not have the information needed to accurately monitor BellSouth's service quality performance.

Response to PMAP Exception

BellSouth Georgia OSS Testing Evaluation

Date: December 22, 1999

PMAP EXCEPTION REPORT AS IDENTIFIED BY KPMG

An exception has been identified as a result of the Performance Measurement testing activities associated with the validation of service quality measurement (SQM) calculations.

Exception:

Competitive Local Exchange Carriers (CLECs) are not notified when BellSouth initiates changes to published historical performance measurement reports and/or the raw data files associated with these reports after this information has been removed from the Performance Measurement and Analysis Platform (PMAP) web site.

KPMG noted the following specific examples of changes to data for a CLEC for the month of August 1999:

- Business Function: Ordering
SQM: Percent Rejected Service Requests
- Business Function: Ordering
SQM: Reject Interval
- Business Function: Provisioning
SQMs: Average Completion Interval and Order Completion Interval (OCI) Distribution.
- Business Function: Provisioning
SQM: Mean Held Order Interval
- Business Function: Provisioning
SQM: Coordinated Customer Conversion.

BellSouth attributed changes in the reported values in these instances either to errors in reporting or to changes in the raw data.

Response to PMAP Exception

BellSouth Georgia OSS Testing Evaluation

Impact

Inaccurate service quality information: The FCC has made it a mandatory requirement for BellSouth to provide its business function (e.g., pre-ordering, ordering, provisioning, maintenance & repair, billing) performance measurement reports to the CLECs with which it does business. CLECs utilize the reports to assess the quality of service provided by BellSouth.

If CLECs are not informed of changes in the reports, they will not have the information needed to accurately monitor BellSouth's service quality performance.

BST Response

The BST Performance Measurement group has in place a Notification Procedure to inform CLECs when reports for the current month are modified or changed. This procedure involves a combination of notices on the PMAP website and direct E-Mail messages to CLECs that have already downloaded reports that change. Based on this Exception found in the audit conducted by KPMG, BST has enhanced its Notification Procedure to include reports that change from previous months. The information as to which monthly reports are affected and instructions how to obtain modified reports are being included on the PMAP website under the HELP menu in a section called Site Update. Information relating to changes in current monthly reports as well as previous monthly reports that have changed will be posted with instructions on how to obtain copies if desired. CLECs will be able to contact the BST Webmaster to obtain copies of past reports that have changed as a result of modifications or data enhancements. The PMAP Users Guide has been modified to describe this Notification Procedure and outlines the changes made to accommodate this improvement in our process.

This new Notification Procedure will be loaded onto the existing website and appropriate documentation will be made available to the CLEC customers accessing the reports on 1/15/00. The implementation of this procedure will insure that all changed reports are available to CLECs, if requested.

CERTIFICATE OF SERVICE

Docket No. 8354-U

This is to certify that I have this day served a copy of the within and foregoing, upon known parties of record, by depositing same in the United States Mail with adequate postage affixed thereto, properly addressed as follows:

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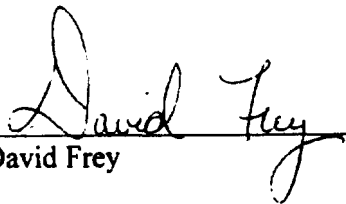
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